

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

TRAVIS GAMBERS,

Civil Action No. 1:07-cv-04841-BSJ

Plaintiff,

-against-

**NOTICE TO TAKE  
DEPOSITION UPON  
UPON ORAL EXAMINATION**

THE CROWN PARADISE HOTELS,  
THE CROWN PARADISE CLUB,  
MARINA DE ORO, RESORTS  
CONDOMINIUMS INTERNATIONAL, LLC,  
FN REALTY SERVICES, INC.,

Defendants.

-----X

PLEASE TAKE NOTICE, that pursuant to F.R.C.P. Rule 30, the testimony, upon oral examination, of a representative defendant, THE CROWN PARADISE CLUB, will be taken before a Notary Public who is not an attorney, or employee of an attorney, or any party or prospective party herein, and is not a person who would be disqualified to act as a juror because of interest, or because of consanguinity or affinity to any party herein, at the offices of ZAREMBA BROWNELL & BROWN PLLC, located at 40 Wall Street, 28th Floor, New York, New York 10005, on **October 3, 2007**.

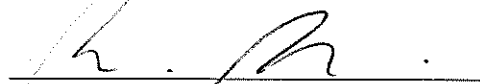
The subject matter of the examination will be as to all evidence material and necessary to the prosecution and defense of this action.

PLEASE TAKE NOTICE, that pursuant to Rule 3111 of the Civil Practice Law and Rules, you are required to produce at the examination, all books, correspondence, records, documents, notes, papers, videotapes, photographs and other things that you may have in your possession, custody or control which relate or refer to any matter in controversy in this action and/or to the dealings or transactions between or among the parties, to be examined, marked as exhibits and used at the examination.

Dated: New York, New York  
August 3, 2007

ZAREMBA BROWNELL & BROWN PLLC

By:



Brian M. Brown (BMB9021)

Attorneys for Plaintiff

TRAVIS GAMBERS

40 Wall Street, 28<sup>th</sup> Floor

New York, New York 10005

(212) 400-7226

TO: Alice Spitz, Esq.  
MOLOD, SPITZ & DESANTIS, P.C.  
Attorneys for Defendants  
MARINA DE ORO, THE CROWN PARADISE HOTEL  
and THE CROWN PARADISE BEACH CLUB  
104 West 40<sup>th</sup> Street  
New York, New York 10018

C. Brian Kornbrek, Esq.  
GREENBAUM, ROWE, SMITH & DAVIS LLP  
Attorneys for Defendant  
RCI  
75 Livingston Avenue, Suite 301  
Roseland, New Jersey 07068  
(973) 535-1600

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

TRAVIS GAMBERS,

Civil Action No. 1:07-cv-04841-BSJ

Plaintiff,

-against-

**NOTICE TO TAKE  
DEPOSITION UPON  
ORAL EXAMINATION**

THE CROWN PARADISE HOTELS,  
THE CROWN PARADISE CLUB,  
MARINA DE ORO, RESORTS  
CONDOMINIUMS INTERNATIONAL, LLC,  
FN REALTY SERVICES, INC.,

Defendants.

-----X

PLEASE TAKE NOTICE, that pursuant to F.R.C.P. Rule 30, upon oral examination, of a representative defendant, THE CROWN PARADISE HOTELS, will be taken before a Notary Public who is not an attorney, or employee of an attorney, or any party or prospective party herein, and is not a person who would be disqualified to act as a juror because of interest, or because of consanguinity or affinity to any party herein, at the offices of ZAREMBA BROWNELL & BROWN PLLC, located at 40 Wall Street, 28th Floor, New York, New York 10005, on **October 3, 2007**.


The subject matter of the examination will be as to all evidence material and necessary to the prosecution and defense of this action.

PLEASE TAKE NOTICE, that pursuant to Rule 3111 of the Civil Practice Law and Rules, you are required to produce at the examination, all books, correspondence, records, documents, notes, papers, videotapes, photographs and other things that you may have in your possession, custody or control which relate or refer to any matter in controversy in this action and/or to the dealings or transactions between or among the parties, to be examined, marked as exhibits and used at the examination.

Dated: New York, New York  
August 3, 2007

ZAREMBA BROWNELL & BROWN PLLC

By:

  
Brian M. Brown (BMB9021)  
Attorneys for Plaintiff  
TRAVIS GAMBERS  
40 Wall Street, 28<sup>th</sup> Floor  
New York, New York 10005  
(212) 400-7226

TO: Alice Spitz, Esq.  
MOLOD, SPITZ & DESANTIS, P.C.  
Attorneys for Defendants  
MARINA DE ORO, THE CROWN PARADISE HOTEL  
and THE CROWN PARADISE BEACH CLUB  
104 West 40<sup>th</sup> Street  
New York, New York 10018

C. Brian Kornbrek, Esq.  
GREENBAUM, ROWE, SMITH & DAVIS LLP  
Attorneys for Defendant  
RCI  
75 Livingston Avenue, Suite 301  
Roseland, New Jersey 07068  
(973) 535-1600

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
TRAVIS GAMBERS,

Civil Action No. 1:07-cv-04841-BSJ

Plaintiff,

-against-

**NOTICE TO TAKE  
DEPOSITION UPON  
UPON ORAL EXAMINATION**

THE CROWN PARADISE HOTELS,  
THE CROWN PARADISE CLUB,  
MARINA DE ORO, RESORTS  
CONDOMINIUMS INTERNATIONAL, LLC,  
FN REALTY SERVICES, INC.,

Defendants.  
-----X

PLEASE TAKE NOTICE, that pursuant to F.R.C.P. Rule 30, the testimony, upon oral examination, of a representative defendant, MARINA DE ORO, will be taken before a Notary Public who is not an attorney, or employee of an attorney, or any party or prospective party herein, and is not a person who would be disqualified to act as a juror because of interest, or because of consanguinity or affinity to any party herein, at the offices of ZAREMBA BROWNELL & BROWN PLLC, located at 40 Wall Street, 28th Floor, New York, New York 10005, on **October 3, 2007**.

The subject matter of the examination will be as to all evidence material and necessary to the prosecution and defense of this action.

PLEASE TAKE NOTICE, that pursuant to Rule 3111 of the Civil Practice Law and Rules, you are required to produce at the examination, all books, correspondence, records, documents, notes, papers, videotapes, photographs and other things that you may have in your possession, custody or control which relate or refer to any matter in controversy in this action and/or to the dealings or transactions between or among the parties, to be examined, marked as exhibits and used at the examination.

Dated: New York, New York  
August 3, 2007

ZAREMBA BROWNELL & BROWN PLLC

By:



Brian M. Brown (BMB9021)

Attorneys for Plaintiff

TRAVIS GAMBERS

40 Wall Street, 28<sup>th</sup> Floor

New York, New York 10005

(212) 400-7226

TO: Alice Spitz, Esq.  
MOLOD, SPITZ & DESANTIS, P.C.  
Attorneys for Defendants  
MARINA DE ORO, THE CROWN PARADISE HOTEL  
and THE CROWN PARADISE BEACH CLUB  
104 West 40<sup>th</sup> Street  
New York, New York 10018

C. Brian Kornbrek, Esq.  
GREENBAUM, ROWE, SMITH & DAVIS LLP  
Attorneys for Defendant  
RCI  
75 Livingston Avenue, Suite 301  
Roseland, New Jersey 07068  
(973) 535-1600

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
TRAVIS GAMBERS,

Civil Action No. 1:07-cv-04841-BSJ

Plaintiff,

-against-

**NOTICE TO TAKE  
DEPOSITION UPON  
UPON ORAL EXAMINATION**

THE CROWN PARADISE HOTELS,  
THE CROWN PARADISE CLUB,  
MARINA DE ORO, RESORTS  
CONDOMINIUMS INTERNATIONAL, LLC,  
FN REALTY SERVICES, INC.,

Defendants.

-----X

PLEASE TAKE NOTICE, that pursuant to F.R.C.P. Rule 30, the testimony, upon oral examination, of a representative defendant, RESORTS CONDOMINIUMS INTERNATIONAL, will be taken before a Notary Public who is not an attorney, or employee of an attorney, or any party or prospective party herein, and is not a person who would be disqualified to act as a juror because of interest, or because of consanguinity or affinity to any party herein, at the offices of ZAREMBA BROWNELL & BROWN PLLC, located at 40 Wall Street, 28th Floor, New York, New York 10005, on **October 4, 2007**.

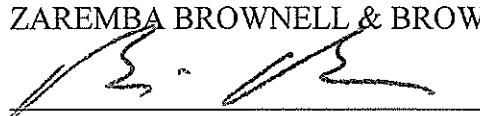
The subject matter of the examination will be as to all evidence material and necessary to the prosecution and defense of this action.

PLEASE TAKE NOTICE, that pursuant to Rule 3111 of the Civil Practice Law and Rules, you are required to produce at the examination, all books, correspondence, records, documents, notes, papers, videotapes, photographs and other things that you may have in your possession, custody or control which relate or refer to any matter in controversy in this action and/or to the dealings or transactions between or among the parties, to be examined, marked as exhibits and used at the examination.

Dated: New York, New York  
August 3, 2007

ZAREMBA BROWNELL & BROWN PLLC

By:

  
Brian M. Brown (BMB9021)

Attorneys for Plaintiff  
TRAVIS GAMBERS  
40 Wall Street, 28<sup>th</sup> Floor  
New York, New York 10005  
(212) 400-7226

TO: Alice Spitz, Esq.  
MOLOD, SPITZ & DESANTIS, P.C.  
Attorneys for Defendants  
MARINA DE ORO, THE CROWN PARADISE HOTEL  
and THE CROWN PARADISE BEACH CLUB  
104 West 40<sup>th</sup> Street  
New York, New York 10018

C. Brian Kornbrek, Esq.  
GREENBAUM, ROWE, SMITH & DAVIS LLP  
Attorneys for Defendant  
RCI  
75 Livingston Avenue, Suite 301  
Roseland, New Jersey 07068  
(973) 535-1600



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
TRAVIS GAMBERS,

Civil Action No. 1:07-cv-04841-BSJ

Plaintiff,

-against-

**NOTICE TO TAKE  
DEPOSITION UPON  
UPON ORAL EXAMINATION**

THE CROWN PARADISE HOTELS,  
THE CROWN PARADISE CLUB,  
MARINA DE ORO, RESORTS  
CONDOMINIUMS INTERNATIONAL, LLC,  
FN REALTY SERVICES, INC.,

Defendants.  
-----X

PLEASE TAKE NOTICE, that pursuant to F.R.C.P. Rule 30, the testimony, upon oral examination, of a representative defendant, FN REALTY SERVICES, INC., will be taken before a Notary Public who is not an attorney, or employee of an attorney, or any party or prospective party herein, and is not a person who would be disqualified to act as a juror because of interest, or because of consanguinity or affinity to any party herein, at the offices of ZAREMBA BROWNELL & BROWN PLLC, located at 40 Wall Street, 28th Floor, New York, New York 10005, on **October 4, 2007**.

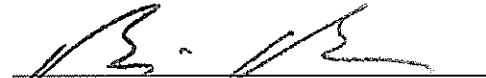
The subject matter of the examination will be as to all evidence material and necessary to the prosecution and defense of this action.

PLEASE TAKE NOTICE, that pursuant to Rule 3111 of the Civil Practice Law and Rules, you are required to produce at the examination, all books, correspondence, records, documents, notes, papers, videotapes, photographs and other things that you may have in your possession, custody or control which relate or refer to any matter in controversy in this action and/or to the dealings or transactions between or among the parties, to be examined, marked as exhibits and used at the examination.

Dated: New York, New York  
August 3, 2007

ZAREMBA BROWNELL & BROWN PLLC

By:



Brian M. Brown (BMB9021)

Attorneys for Plaintiff

TRAVIS GAMBERS

40 Wall Street, 28<sup>th</sup> Floor

New York, New York 10005

(212) 400-7226

TO: Alice Spitz, Esq.  
MOLOD, SPITZ & DESANTIS, P.C.  
Attorneys for Defendants  
MARINA DE ORO, THE CROWN PARADISE HOTEL  
and THE CROWN PARADISE BEACH CLUB  
104 West 40<sup>th</sup> Street  
New York, New York 10018

C. Brian Kornbrek, Esq.  
GREENBAUM, ROWE, SMITH & DAVIS LLP  
Attorneys for Defendant  
RCI  
75 Livingston Avenue, Suite 301  
Roseland, New Jersey 07068  
(973) 535-1600